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CORKINS, KAY S. MEEK, KYLE CARTER, CHRISTINA
SCRIVNER, NAN GOMEZ-HEITZEBERG, and YOVANI
JIMENEZ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA - BAKERSFIELD

DAYMON JOHNSON,

Plaintiff,

v.

STEVE WATKIN, in his official
capacity as Interim President, Bakersfield
College; RICHARD McCROW, in his
official capacity as Dean of Instruction,
Bakersfield College; THOMAS BURKE,
in his official capacity as Chancellor,
Kern Community College District;
SONYA CHRISTIAN, in her official
capacity as Chancellor, California
Community Colleges; ROMEO
AGBALOG, in his official capacity as
President, Kern Community College
District Board of Trustees; JOHN S.
CORKINS, in his official capacity as
Vice President, Kern Community
College District Board of Trustees; KAY
S. MEEK, in her official capacity as
Clerk, Kern Community College District
Board of Trustees; KYLE CARTER, in
his official capacity as Trustee, Kern
Community College District;
CHRISTINA SCRIVNER, in her official

Case No.: 1:23-cv-00848 CDB

Complaint Filed: June 1, 2023
FAC Filed: July 6, 2023

**DECLARATION OF DAVID A. URBAN IN
SUPPORT OF DEFENDANTS' NOTICE OF
MOTION AND MOTION TO DISMISS FIRST
AMENDED COMPLAINT**

[Motion to Dismiss filed concurrently herewith]

Date: October 16, 2023
Time: 1:30 p.m.
Courtroom: Honorable Ana de Alba

capacity as Trustee, Kern Community College District; NAN GOMEZ-HEITZEBERG, in her official capacity as Trustee, Kern Community College District; and YOVANI JIMENEZ, in his official capacity as Trustee, Kern Community College District,

Defendants.

DECLARATION OF DAVID URBAN

I, David Urban, declare and state as follows:

1. I am counsel for Defendants Steve Watkin, Richard McCrow, Thomas Burke, Romeo Agbalog, John S. Corkins, Kay S. Meek, Kyle Cater, Christina Scrivner, Nan Gomez Heitzberg, and Yovani Jimenez in the above-captioned matter. I am over the age of 18 years old, and I make this declaration of my own personal knowledge.

2. On August 22, 2023, I e-mailed counsel to set up a telephonic meet-and-confer session to discuss this Motion, in compliance with this Court's Standing Order, p.2. Once a time was scheduled for a call with counsel, I sent a meeting invite for the call.

3. On August 28, 2023, at 1:00 p.m., counsel for the parties conducted the telephonic meet-and-confer regarding the merits of the instant motion. Alan Gura and Courtney Corbello participated on behalf of Plaintiff Daymon Johnson. Jay Russel and Jane Reilly from the California Attorney General's Office participated on behalf of Defendant Sonya Christian. Jennifer Denny and I participated on behalf of the Defendants listed above. We discussed the substance of the instant Motion and any potential resolution, and exhausted these efforts during the call. Counsel did not reach a resolution of the matters presented by the instant Motion.

Executed this 29th day of August, 2023, at Los Angeles, California.

/s/ David A. Urban

David A. Urban